

**Service of Process
Transmittal**

07/22/2021

CT Log Number 539944092

TO: Kim Lundy- Email
Walmart Inc.
702 SW 8TH ST
BENTONVILLE, AR 72716-6209

RE: Process Served in Tennessee

FOR: Wal-Mart Stores East, LP (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Graham Karen, Pltf. vs. Walmart Inc. and Wal-Mart Stores East, LP, Dfts.

DOCUMENT(S) SERVED: Letter, Summons, Complaint, Request, Certificate, First Set of Interrogatories and Request(s)

COURT/AGENCY: Cocke County - Circuit Court, TN
Case # 36125III

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 07/22/2020, 1075 Cosby Hwy, Newport Cocke County, TN

ON WHOM PROCESS WAS SERVED: C T Corporation System, Knoxville, TN

DATE AND HOUR OF SERVICE: By Certified Mail on 07/22/2021 postmarked on 07/21/2021

JURISDICTION SERVED : Tennessee

APPEARANCE OR ANSWER DUE: Within 30 days after service, exclusive of the day of service (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): T. Scott Jones
Banks & Jones
2125 Middlebrook Pike
Knoxville, TN 37921
865-546-2141

ACTION ITEMS: CT has retained the current log, Retain Date: 07/22/2021, Expected Purge Date: 07/27/2021

Image SOP

REGISTERED AGENT ADDRESS: C T Corporation System
300 Montvue RD
Knoxville, TN 37919
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

CERTIFIED MAIL®

**LAW OFFICES
BANKS & JONES**

2125 MIDDLEBROOK PIKE
KNOXVILLE, TENNESSEE
37921-5855



7019 2280 0000 2608 1996

FIRST-CLASS



PITNEY BOWES
US POSTAGE
\$ 007.36⁰
02 1P
0003598919 JUL 21 2021
MAILED FROM ZIP CODE 37921



Wal-mart Stores East, LP.
c/o C.T. Corporation System, Reg. Agent
300 Montvue Road
Knoxville, TN 37919
VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO.: 7019 2280 0000 2608 1996

LAW OFFICES OF

BANKS & JONES

2125 MIDDLEBROOK PIKE
KNOXVILLE, TN 37921-5855



* T. SCOTT JONES
TENNESSEE SUPREME COURT RULE 31
LISTED GENERAL CIVIL MEDIATOR

ATTORNEYS

* T. SCOTT JONES
CHRIS W. BEAVERS
GENA LEWIS
LANDON M. HICKEY
DARLA M. WALKER
TAYLOR C. ERWIN
VICTORIA K. RAULERSON

ADMINISTRATOR

ANN H. LANE, LPI & PARALEGAL

TEL (865) 546-2141
FAX (865) 546-5777

WILLIAM R. BANKS (1928-2010)

OF COUNSEL
BRENT S. SNYDER
DIRECT TEL. 264-3328

SUSAN E. HAAS
DIRECT TEL. 406-2810

July 21, 2021

Wal-mart Stores East, LP.
c/o C.T. Corporation System, Reg. Agent
300 Montvue Road
Knoxville, TN 37919
VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO.: 7019 2280 0000 2608 1996

RE: Karen Graham v. Walmart Inc., and Wal-Mart Stores East, LP
Cocke County Circuit Court, Civil Action No.: 36125-III

To Whom It May Concern:

Relative to the above captioned matter, please find enclosed a Summons, Complaint, Interrogatories, and Request for Admissions.

As always, I remain,

Very truly yours,

BANKS & JONES

T. Scott Jones

CWB/mdc

Enclosures: Summons, Complaint, Interrogatories, and Request for Admissions

JUL 13 2021

STATE OF TENNESSEE
THE CIRCUIT COURT FOR COCKE COUNTY

Cocke County
Circuit Court

SUMMONS

KAREN GRAHAM,
Plaintiff,

vs.

WALMART INC. and WAL-MART STORES EAST, LP,
Defendants.

Civil Action No. 36125-III

To the above named defendant (s):

You are hereby summoned and required to serve upon T. Scott Jones, plaintiff / plaintiff's attorney, whose address is 2125 Middlebrook Pike, Knoxville, TN 37921 an answer to the complaint herewith served upon you within 30 days after service of this summons and complaint upon you, exclusive of the day of service. A copy of the answer must be filed with the court either before or within a reasonable time after service. If you fail to do so, judgment by default can be taken against you for the relief demanded in the complaint.

Issued and attested this the 13th day of July, 2021

Kristyl L. Nease
Kristyl L. Nease, Clerk

Melinda Cameron
Deputy Clerk

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

SERVICE INFORMATION

To the process server: Defendant: WAL-MART STORES EAST, LP
(TO BE SERVED BY PLAINTIFF'S COUNSEL)

can be served at: Wal-mart Stores East, LP.
c/o C.T. Corporation System, Reg. Agent
300 Montvue Rd.
Knoxville, TN 37919

RETURN

I received this summons on the ____ day of _____, _____.

I hereby certify and return that on the ____ day of _____, _____, I:

[] served this summons and complaint on the defendant _____ in the following manner:

[] failed to serve this summons within 90 days after its issuance because: _____

Process Server

Print Name

Address

Phone Number



DEFENDANT'S
COPY

The Americans with Disabilities Act prohibits discrimination against any qualified individual with a disability. The Tennessee Judicial Branch does not permit discrimination against any individual on the basis of physical or mental disability in accessing its judicial programs. In accordance with the Americans with Disabilities Act, if necessary, the Tennessee Judicial Branch will provide reasonable modifications in order to access all of its programs, services and activities to qualified individuals with disabilities.

If you require a modification to access the judicial program and/or have special needs because of a qualified disability, you must submit a written **Request for Modification** to the Local Judicial Program ADA Coordinator listed below at least five (5) business days prior to the date of the judicial proceeding, if possible. A form is available from the Local Judicial Program ADA Coordinator or from the Tennessee Judicial Program ADA Coordinator (www.tncourts.gov)

If you need assistance, have questions or need additional information, please contact the Local Judicial Program ADA Coordinator:

Pat Carson, Compliance Officer
Knox County Human Resources Office
Suite 360, City-County Building
400 Main Street, Knoxville, Tennessee 37902
Voice Phone: (865) 215-2952 TTY: (865) 215-2497

If you need assistance, have questions or need additional information, you may also contact the Tennessee Judicial Program ADA Coordinator:

Pamela Taylor, Manager/Coordinator
State Judicial ADA Program
Administrative Office of the Courts
Nashville City Center
Suite 600, 511 Union Street
Nashville, Tennessee 37219
Telephone: (615) 741-2687 FAX: (615) 741-6285

The Tennessee Judicial Branch's Americans with Disabilities Act Policy regarding access to judicial program, as well as a Request for Modification form may be found online at www.tncourts.gov.

JUL 13 2021

Cocke County
Circuit CourtIN THE CIRCUIT COURT FOR COCKE COUNTY, TENNESSEE

KAREN GRAHAM,

Plaintiff,

vs.

WALMART INC. and

Serve: CT Corporation System, Registered Agent
300 Montvue Rd.
Knoxville, TN 37919-5546

WAL-MART STORES EAST, LP,

Serve: CT Corporation System, Registered Agent
300 Montvue Rd.
Knoxville, TN 37919-5546

Defendants.

Civil Action No. 36125-III) *TWELVE (12) PERSON*) *JURY TRIAL DEMANDED***CIRCUIT COURT
FILED** *MC*

JUL 13 2021

**KRISTY L. NEASE
CIRCUIT COURT CLERK
Cocke County, TN**COMPLAINT

Comes now the Plaintiff, Karen Graham, by and through counsel, for her cause of action against the Defendants, Walmart Inc. and Wal-Mart Stores East, LP, and would respectfully show unto this Honorable Court:

1. The Defendants, Walmart Inc. and Wal-Mart Stores East, LP, operate a store known as "Wal-Mart" which is located at 1075 Cosby Hwy, Newport, Cocke County, Tennessee, and may be served with process as captioned above.
2. On or about July 22, 2020, the Plaintiff, Karen Graham, was a business invitee of the said business and was on the premises during the hours of operation by Defendants for the purpose of entrance by the public.
3. At all times material herein, the Defendants, through their agents, servants, and employees, operated, owned, managed, maintained, and controlled the facility at which the Plaintiff was injured.

STATE OF TENNESSEE, COCKE COUNTY
I, Kristy L. Nease, Clerk of the Circuit Court of
Cocke County, Tennessee, certify that the foregoing
is a true copy of the original bill filed in this cause.
Witness my hand and official seal of office on this
13th day of July, 2021
Kristy L. Nease-MC
Circuit Court Clerk

4. While the Plaintiff, Karen Graham, was shopping at the property at issue, she slipped and fell due to liquid that was on the floor of the Defendants' property.

5. The Defendants, through their agents, servants, and employees, were negligent in allowing the floor to remain in a dangerous condition such that it was dangerous to the public at large and to the Plaintiff, Karen Graham, in particular.

6. Prior to the accident at issue, the Defendants, through their agents, servants, and employees, knew or, through the exercise of reasonable diligence should have known, about the hazardous condition of the floor.

7. The Defendants were negligent in failing to adequately warn the public at large and the Plaintiff, Karen Graham, in particular, of the floor's dangerous condition.

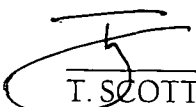
8. At no time material herein was the Plaintiff, Karen Graham, negligent in her conduct or actions.

9. As a direct consequence of the Defendants' negligence, the Plaintiff, Karen Graham, suffered injuries to her person, experienced pain of mind and body, and incurred expenses for her medical care.

WHEREFORE, the Plaintiff, Karen Graham, demands judgment against the Defendants in the amount of ONE-HUNDRED-AND-FIFTY THOUSAND (\$150,000.00) DOLLARS and no/100 cents.

The Plaintiff demands a jury try this action.

Respectfully submitted, this the 11 day of July, 2021.


T. SCOTT JONES
CHRIS W. BEAVERS
Attorneys for the Plaintiff
BANKS & JONES
2125 Middlebrook Pike
Knoxville, Tennessee 37921
(865) 546-2141
tscottjones@banksandjones.com
chrisbeavers@banksandjones.com

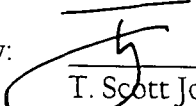
COST BOND

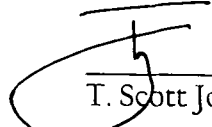
We, the undersigned, do hereby acknowledge ourselves as surety for all of the costs of this cause.

This the 11 day of July, 2021.

Karen Graham, Principal

By:


T. Scott Jones, Attorney
BANKS & JONES, Surety


T. Scott Jones, Attorney